

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION**

In Re:

Pennie Kathleen Nelson-Quick

Debtor.

Case No. 18-21006-dob
Chapter 13 Bankruptcy

Hon. Daniel S. Opperman

DEBTOR'S FIRST POST CONFIRMATION CHAPTER 13 PLAN MODIFICATION

Pennie Kathleen Nelson-Quick (Debtor), by and through her attorney, Reinert & Reinert, by Joshua M. Reinert, propose the following post confirmation modification to the debtors' Chapter 13 Plan:

- 1) Debtor proposes the following change to her plan: The debtors' Chapter 13 plan payment hereafter shall be \$2,985.00 monthly for 84 months from the date of confirmation, August 24, 2018 pursuant to 11 U.S.C. Section 1329(d)(1) AND the debtor shall pay to the Trustee her State of Michigan income tax refunds.
- 2) Debtor proposes that, upon court approval of this plan modification, any plan funding delinquency as a result of missed plan payments (if any) or failure to pay income tax refunds to the Trustee is forgiven.
- 3) All other terms of the confirmed plan and the August 24, 2018 Order Confirming Plan remain the same and are incorporated herein.
- 4) The debtor will not be filing Amended Schedules I & J.

Pursuant to LBR 3015-2(b)(1)(C) the impact of the proposed plan modification on each class of creditors is as follows:

- 1) Class One: NONE

- 2) Class Two: NONE
- 3) Class Three: NONE
- 4) Class Four: NONE
- 5) Class Five: NONE
- 6) Class Six: NONE
- 7) Class Seven: NONE
- 8) Class Eight: NONE
- 9) Class Nine: There will be a reduction in the distribution to Class 9 creditors.

Attached hereto are the following as required by LBR 3015-1(b) and 3015-2(b)(1)(B):

- 1) Liquidation Analysis (See Attachment 1);
- 2) Chapter 13 Worksheet (See Attachment 2).

Dated: October 5, 2020

Respectfully Submitted,

REINERT & REINERT


/s/ Joshua M. Reinert

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/s/ Pennie Kathleen Nelson-Quick

Pennie Kathleen Nelson-Quick

Debtor

ATTACHMENT 1

LIQUIDATION ANALYSIS AND STATEMENT OF VALUE OF ENCUMBERED PROPERTY

TYPE OF PROPERTY	FAIR MARKET VALUE	LIENS	DEBTOR'S SHARE OF EQUITY	EXEMPT AMOUNT	NON-EXEMPT AMOUNT
REAL PROPERTY	196,000.00	207,171.57	12,676.90	12,676.90	0.00
HHG/PERSONAL EFFECTS	710.00	0.00	710.00	710.00	0.00
JEWELRY	5.00	0.00	5.00	5.00	0.00
CASH/BANK ACCOUNTS	1.00	0.00	1.00	1.00	0.00
VEHICLES	12,250.00	13,684.60	750.00	750.00	0.00
OTHER (itemize)					
Sears riding lawn mower, misc. farm/yard tools, 2 hoop houses 20'x24' damaged covering	1,500.00	0.00	1,500.00	1,500.00	0.00

Amount available upon liquidation.....	\$	<u>0.00</u>
Less administrative expenses and costs.....	\$	<u>0.00</u>
Less priority claims.....	\$	<u>777.09</u>
Amount Available in Chapter 7.....	\$	<u>0.00</u>

ATTACHMENT 2 - CHAPTER 13 WORKSHEET

Name	Claimed Amount	Balance Owed	Interest Rate	Monthly Payment	To Be Paid
Joshua Reinert with Approved and Estimated Post Confirmation Legal Fees	\$6,868.20				\$2,200.00
David J and Virginia J Dilks				\$700.00 monthly	\$40,600.00
David J and Virginia J Dilks	\$4,506.47	\$4,506.47			\$4,506.47
JPD, Inc.				\$502.00	\$29,116.00
JPD, Inc.	\$3,231.77	\$3,231.77			\$3,231.77
SN Servicing Corporation - EFT				\$433.29	\$25,130.82
SN Servicing Corporation - EFT	\$2,904.48	\$2,904.48			\$2,904.48
David J and Virginia J Dilks	\$6,200.00	\$6,200.00			\$6,200.00
JPD, Inc.	\$4,162.14	\$4,162.14			\$4,162.14
SN Servicing Corporation - EFT	\$8,153.95	\$8,153.95			\$8,153.95
Oscoda County Treasurer	\$6,471.00	\$6,471.00	18.00%	\$167.84	\$9,734.34
Oscoda County Treasurer	\$3,058.88	\$3,058.88	18.00%	\$79.34	\$4,601.44
Oscoda County Treasurer	\$1,904.79	\$1,904.79	18.00%	\$49.40	\$2,865.55
Oscoda County Treasurer	\$900.42	\$900.42	18.00%	\$23.35	\$1,354.66
Oscoda County Treasurer	\$5,004.65	\$5,004.65	18.00%	\$129.80	\$7,528.74
Oscoda County Treasurer	\$2,365.73	\$2,365.73	18.00%	\$61.36	\$3,558.79
Oscoda County Treasurer	\$1,319.22	\$1,319.22	18.00%	\$34.22	\$1,984.40
Oscoda County Treasurer	\$623.62	\$623.62	18.00%	\$16.17	\$938.29
Oscoda County Treasurer	\$1,719.61	\$1,719.61	18.00%	\$44.60	\$2,586.88
Oscoda County Treasurer	\$812.86	\$812.86	18.00%	\$21.08	\$1,222.90
All Unsecured Creditors	Total Unsecured		Estimated Percent To Be Paid to Unsecured		
	\$19,366.37		4.4%		\$853.10

ATTACHMENT 2 - CHAPTER 13 WORKSHEET